

ALASKA

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Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the March meeting in Anchorage. The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to change non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are inline with the principles of sustained yield and result in a maximum benefit of ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

As you consider our positions we urge you to keep in mind that Alaska's professional guide industry represents a significant and important economy in rural Alaska. In addition to the "new dollars" the guide industry brings to rural Alaska and the private sector at large, our client's tag and license purchases directly and indirectly, through matching Federal funds, provide the "lion's share" of ADF&G's funding. The health of our industry is dependent upon prudent stewardship and conservation of Alaska's wildlife as well as fair allocation. It is precisely because of our stewardship principles and respect for all users and a fair allocation process that our members maintain deep community ties across our vast State. Alaska's professional hunters ask that when you consider the below comments you remain mindful that it is in our best interest to have abundant game as well as a healthy, inclusive social situation that is in the best interests of ALL Alaskans.

Individual Proposal Comment

Below you will find our comments on individual proposals under your consideration. Leading up to the drafting of these comments the APHA held a tele-conference and invited all of its members to participate in the drafting of these comments. This tele-conference was well attended with good representation from guides who conduct hunts in Region III. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or that are outside of the group's purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. The APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge and experience to the table.

Guide Client Agreements (Proposal 146)- Oppose As Written

"Guide Client Agreements" (GCAs) are the cornerstone of operating a successful guide business in areas managed under a drawing hunt system. This is especially true for guide required species in areas where small numbers of tags are issued for "high value" species. Kodiak Island is the classic example of this and the area that has operated the longest with GCA requirements. Kodiak Island is broken up into drawing units that match Guide Use Area boundaries. Federal concession boundaries on the Island also correspond to these state boundaries (Guide Use Areas, Drawing Units). The result is that when a non-resident wishes to hunt on Kodiak he finds a guide who he wants to patronize, they come to an agreement on the hunt services, sign and GCA and this potential client's name is put in for the draw. Since each guide's area has only X# of tags issued per year he only needs to enter into that many GCA's and all of the tags are spoken for. Since Kodiak Brown Bears are among the most valuable game animals in the world the guide is able to insure that the person drawing the tag understands the costs and time required to complete a successful hunt. The department benefits in that it processes a very small number of non-resident applications with virtually every non-resident tag being utilized every year. Non-resident clients benefit by being able to choose their guide and hunt area based on their expectations of quality and safety. Guides benefit because only clients that are able to afford their services, apply in their area thus assuring maximum return and economic benefit for limited resource. The predictability and stability that the GCA's insure has allowed Kodiak guides to run some of Alaska's most successful, sustainable and profitable guide businesses in Alaska. **GCA's on Kodiak have proven beneficial to all users and most importantly, the resource continues to thrive with them in place thus lowering all types of costs the Department could be incurring to manage the world famous bears on the "Emerald Isle."**

The successes of GCA's on Kodiak are particularly evident where drawing units correspond with Federal Guide Concessions. Guide Concessions on USFWS lands are issued for 10 years and then must be re-competed for through a competitive prospectus process. It is therefore very easy for the Department to administer GCA's where one guide has a land use authorization to operate for 10 years. Where equitable administration of GCA's becomes a problem is on lands that allow for an **unlimited number of guides** who can choose to register for Guide Use Areas for as short a term as one year. So when there is a requirement to have GCA to apply for a non-resident sheep tag in a drawing unit that on State Land, it is impossible for ADF&G to know which guide is legally registered to conduct hunts, given the current level of interface with the Div. of Corp. and Prof. Licensing. Thus, equitable administration of a regulation that is good for the resource and the industry is impossible because of a lack of an inability for one State institution to communicate with another. We therefore agree that Guide Client Agreement reform is order to assure more equitable, enforceable **State-wide** application of this system.

The APHA believes it is essential that you vote for the solution proposed by the sub-committee on GCAs. There has been a tremendous amount of problem solving done on this issue since the December Big Game Commercial Services Board meeting but in order for this work to bear fruit, the Board of Game must pass a regulation that addresses the Departments concerns listed in this proposal. Failure to act, or voting down the regulation **will result in chaos and financial loss for guides who rely on GCAs.** A lapse in GCA requirements will result in Non-Residents applying

for hunts, without knowing they need a guide or the cost of guide services. Without the GCAs, these tags will go unused and result in financial FAILURE for affected guides whose livelihoods are at stake.

Please amend this proposal and pass the GCA subcommittee's suggested regulations that will work with regulations yet to be passed by the Commercial Services Board.

Proposal 134- Support Option 2

We support this effort to align requirements with Option 2 being our preferred solution.

Proposal 141- Oppose as written

We support the intent of this proposal but not the proposal as written. The word "immediately" needs leave time for skinning and correct field handling. For instance; if only the skull is required to be salvaged, then under this proposal the tag must be affixed to the skull. Since attaching a locking tag to the skull requires fully skinning the animal this, by definition, can not be done immediately upon harvest. It is common for bears to be harvested late at night and fully skinned in the morning. This means a person, where only the skull is required for salvage, would have leave the bear un-tagged in certain scenarios. Where the hide can be tagged, this is not a problem and it is easy to "immediately" tag a bear.

Please give careful consideration to the word "immediately" as it relates to this proposal.

Proposal 145- Oppose

We oppose this proposal as written. If we increase the limit to three, what is to prevent an increase to 5. We would support this proposal if it clarified that 2nd degree of kindred, drawn under all party hunts, were considered residents for allocation.

Proposal 158-161

We support **proposal 161** as the preferred solution to the problem statement in these series of proposals for the Departments state reasons.

Proposal 164- OPPOSE

We oppose this proposal and agree with the Departments position.

Sincerely,

Thor Stacey

